# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	: Case #2:18-cr-00193-NIQA-1
v.	: :
DKYLE JAMAL BRIDGES	: :
	ORDER
AND NOW, to wit, this	day of April 2018, the Court hereby FINDS and
<b>ORDERS</b> as follows:	
1. Defendant's Motion to Continu	e Trial is <b>GRANTED</b> ;
2. Jury selection and trial currently	y scheduled for August 17, 2018 is cancelled;
3. A status conference with couns	sel for the Government and counsel for all Defendants
shall be scheduled for	, 2018;
4. The time period from August 1	17, 2018 is excluded from the time within which trial
must commence pursuant to the	e Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A) and 18
U.S.C. §3161(h)(7)(B)(I) and (i	v); and,
5. The ends of justice served by §	granting the continuance outweigh the best interest of
the public and the Defendants in	n a speedy trial.
	BY THE COURT:
	Nitza I Quinones Alejandro, DCJ

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DKYLE JAMAL BRIDGES

## DEFENDANT'S UNOPPOSED MOTION TO CONTINUE TRIAL

TO THE HONORABLE NITZA I QUINONES ALEJANDRO, JUDGE OF THE SAID COURT:

Defendant, Dkyle Jamal Bridges, by and through his attorney, Andrew David Montroy, hereby moves for a continuance of the August 17, 2018 trial, and requests that a conference with the Government and all defense counsel be scheduled, and in support thereof, states as follows:

- 1. On May 10, 2018, an Indictment was filed charging Dkyle Jamal Bridges and Kristen Jones in the above-captioned matter.
  - 2. Trial is set for August 17, 2018.
- 3. Discovery is voluminous, and is believed to consist of thousands of documents.

  Additional time is needed for review of discovery and further investigation of the charges.

  Counsel believes it may be necessary to review same with defense experts.
  - 4. Additionally, counsel herein will be out-of-town on a prepaid family vacation.
- 5. Defense counsel is requesting a continuance of the August 17, 2018, and would also ask that Court schedule this matter for a conference with the Government and all defense counsel so that a trial date certain and pretrial motions deadline can be selected.
- 6. Pursuant to 18 U.S.C. §3161(h)(7)(B), and consistent with the holding in <u>United</u> States v. Toombs, 574 F.3d 1262 (10<sup>th</sup> Cir. 2009), Defendant submits that good grounds exist for the continuance.

7. The ends of justice will be served by granting a trial continuance pursuant to

§3161(h)(7)(A).

8. Granting a continuance for the above-stated reasons outweigh the interest of the

public and the Defendants in a speedy trial. Furthermore, a plea agreement between the United

States and the Defendant, or a properly prepared defense, is in the best interests of justice.

9. The time until the next scheduled trial date is excludable time under the Speedy Trial

Act, and all reasons for the continuance appear on the face of the motion such that a supporting

brief is unnecessary.

10. This Motion has the Government's and co-counsel's concurrence.

WHEREFORE, Defendant, Dkyle Jamal Bridges, respectfully requests this Honorable

Court enter an Order continuing the August 17, 2018 trial, schedule a conference with the

Government and all defense counsel, and for such other and further relief which the Court deems

just.

Respectfully submitted,

/s/ Andrew Montroy

Law Offices of Andrew David Montroy By: Andrew David Montroy, Esquire 1500 Walnut Street, 22<sup>nd</sup> Floor Philadelphia, PA 19102 (215) 735-1850 amontroy@gmail.com

Attorney for Defendant Bridges

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## **CERTIFICATE OF SERVICE**

I, Andrew David Montroy, Esquire, hereby certify that I am this day electronically filing Defendant's Unopposed Motion to Continue Trial, as well as serving a true and correct copy of same upon the following by first class mail, postage prepaid:

Seth M. Schlessinger, Asst. U.S. Atty. Office of the United States Attorney 615 Chestnut Street, Suite 1250 Philadelphia, PA 19106

Leigh Michael Skipper, Esquire Defender Association of Philadelphia The Curtis Center, Suite 540 West Independence Square West Philadelphia, PA 19106 Attorney for Defendant Jones

## /s/ Andrew Montroy

Law Offices of Andrew David Montroy By: Andrew David Montroy, Esquire 1500 Walnut Street, 22<sup>nd</sup> Floor Philadelphia, PA 19102 (215) 735-1850 amontroy@gmail.com Attorney for Defendant Bridges

DATED: June 4, 2018